

June 28, 2017

Rebekah P. Goodheart
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Ms. Kris Monteith
Chief
Wireline Competition Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: **In re Request of Telcordia Technologies, Inc. d/b/a iconectiv to Approve Modifications to the Local Numbering Portability Administrator Code of Conduct and the Ericsson Voting Trust, and, if Necessary, the Minority Investment by FP Icon Holdings, L.P., WC Docket Nos. 07-149 and 09-109; CC Docket No. 95-116**

Dear Ms. Monteith:

FP-Icon Holdings, L.P. (“FP”) submits this letter as a supplement to its March 31, 2017 request for the Federal Communications Commission (“Commission”) to approve, if necessary, FP’s minority investment in Telcordia Technologies, Inc. d/b/a iconectiv as well as modifications to the Local Numbering Administrator Code of Conduct and voting trust held by Ericsson Holdings II, Inc.¹

In its Request, FP made clear that it is neutral and raises no undue influence concerns.² Thus, FP meets the Commission’s neutrality criteria for the Local Number Portability Administrator (“LNPA”) set forth in the Federal Communications Commission’s rules.³ In this letter, FP confirms that it meets all three prongs of the Commission’s neutrality test and that no telecommunications service provider owns a majority of FP’s debt, or is a source of a majority of FP’s revenues.⁴

¹ Request of Telcordia Technologies, Inc. d/b/a iconectiv to Approve Modifications to the Local Numbering Portability Administrator Code of Conduct and the Ericsson Voting Trust, and, if Necessary, the Minority Investment by FP Icon Holdings, L.P, WC Docket Nos. 07-149 and 09-109; CC Docket No. 95-116 (filed Mar. 31, 2017) (“Request”).

² Request at 9-14.

³ 47 C.F.R. § 52.12(a).

⁴ 47 C.F.R. § 52.12(a)(1)(ii) (noting that the LNPA “may not issue a majority of its debt to, nor may it derive a majority of its revenues from, any telecommunications service provider.”).

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Please contact me if you have any questions regarding these matters.

Sincerely,

/s/ Rebekah P. Goodheart

Rebekah P. Goodheart
Counsel to Francisco Partners, LP

cc: Ann Stevens
Neil Dellar
Michele Sclater